

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
AT COLUMBUS DIVISION**

**IN RE:**

**CAREN S WILLIAMSON**

**DEBTOR**

**IN PROCEEDINGS UNDER CHAPTER 13**

**CASE NO: 2:18-bk-55613**

**JUDGE: C. KATHRYN PRESTON**

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**TANYA SMITH**

**PLAINTIFF**

**VS.**

**CAREN S. WILLIAMSON, ET AL**

**DEBTOR/DEFENDANT**

**ADVERSARY PRO NO.: 2:21-AP-02025**

**ANSWER OF DEFENDANT PHH MORTGAGE CORPORATION**

1. Now comes Defendant, PHH Mortgage Corporation, and for its Answer to the Complaint herein denies each and every allegation contained therein for want of knowledge sufficient to form a belief as to the truth of the allegations contained in the Complaint, but admits that it has an interest in the property which is subject of the Complaint as further described below.
2. Further answering, Defendant PHH Mortgage Corporation states that its interest is secured by a valid first mortgage lien upon the real estate described in Plaintiff's Complaint, which mortgage was duly filed for record in the county recorder's records.

**AFFIRMATIVE DEFENSES**

3. PHH Mortgage Corporation incorporates each and every statement contained in Paragraphs 1-2 hereinabove as if fully rewritten at length.
4. Plaintiff's Complaint is barred against Defendant PHH Mortgage Corporation because it fails to state a claim against PHH Mortgage Corporation upon which relief can be granted.
5. PHH Mortgage Corporation reserves the right to further amend its Answer or amend to add Cross-Claims or Counterclaims following receipt of additional information via discovery or otherwise.

WHEREFORE, PHH Mortgage Corporation having fully answered prays that its interest be protected and that its rights as first mortgage lien holder be upheld. PHH Mortgage Corporation further prays that it be entitled to recover court costs, advances and other charges as allowed by law.

/s/ Phillip Barragate

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served electronically on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court

and by first class mail on June 9, 2021 addressed to:

Caren S Williamson, 3223 Lakebreeze Drive, Haines City, FL 33844

/s/ Phillip Barragate

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